

**McMANIMON, SCOTLAND
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Counsel to Plaintiff Andrea Dobin, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

NATIONAL MANAGEMENT &
PRESERVATION SERVICES, LLC, d/b/a
NATIONAL FIELD NETWORK, LLC,

Debtor.

Case No. 18-16859 (CMG)

Chapter 7

Honorable Christine M. Gravelle, U.S.B.J.

ANDREA DOBIN, Chapter 7 Trustee,

Plaintiff

v.

THE GEORGE WASHINGTON
UNIVERSITY,

Defendant.

Adv. No. 24-1550 (CMG)

**STIPULATION OF DISMISSAL
WITHOUT PREJUDICE**

THIS MATTER having been presented to the Court by Plaintiff Andrea Dobin, Chapter 7 Trustee (“**Plaintiff**”) for National Management & Preservation Services, LLC, d/b/a National Field Network, Chapter 7 debtor (“**Debtor**”) upon the filing of an action in the Superior Court of New Jersey, Law Division, Mercer County at Docket No. MER-L-1451-24 against Defendant The George Washington University (“**Defendant**”), seeking to recover alleged fraudulent transfers (“**Litigation**”); and on August 29, 2024, Defendant having removed the Litigation to

the United States Bankruptcy Court for the District of New Jersey where the Debtor's bankruptcy case is pending (“**Adversary Proceeding**”); and it is

STIPULATED AND AGREED, that the Adversary Proceeding is hereby dismissed *without* prejudice; and it is further

STIPULATED AND AGREED that to the extent that the Plaintiff reopens the Litigation or files a complaint against the Defendant on the same theory as set forth in the Litigation, the Defendant waives its right to assert a statute of limitations defense unless same existed based upon the original filing date of the Litigation of July 26, 2024. Nothing herein constitutes a waiver of any rights, claims or defenses of the Defendant as to any statute of limitations relating to the filing date of the original Litigation.

SAUL EWING LLP

Counsel to Defendant The George Washington University

Dated: November 13, 2024

By: /s/ Turner N. Falk
TURNER N. FALK

**McMANIMON, SCOTLAND
& BAUMANN, LLC**

Counsel to Plaintiff Andrea Dobin, Chapter 7 Trustee

Dated: November 13, 2024

By: /s/ Michele M. Dudas
MICHELE M. DUDAS